



# Federal Defenders OF NEW YORK, INC.

Southern District  
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August 3, 2007

By Hand & ECF

Honorable Kenneth M. Karas  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Angela Huang, et al.**  
**06 Cr. 1006 (KMK)**

Dear Judge Karas,

With the gracious consent of the government, I write on behalf of my client, Bouhari Adoyi, to request an extension of the scheduled deadline for the filing of the defendant's reply in the above-captioned case. We filed a post-hearing pleading on July 13, 2007, and the government responded on July 20, 2007. Defendant's reply was to be filed today, August 3, 2007. We ask to be allowed to file our reply no later than August 17, 2007.

This request is made necessary because of an unexpectedly heavy work load secondary to undersigned counsel's impending departure from the Federal Defenders of New York. Consequently, the motions schedule set in open court, is based on counsel's misjudgement as to the time available to draft the reply. These concerns have no bearing on the merits of Mr. Adoyi's claims and are fully beyond his control. Undersigned counsel asks for this extension in order to fully ventilate those claims on his behalf.

I may be reached at (212) 417-8761 if more information or argument is required.

Respectfully submitted,



Christopher A. Flood  
Counsel for Bouhari Adoyi

CC: Steve Lee  
Assistant United States Attorney